

## Comment

Consultee	Mrs Susan Davidson (829945)
Email Address	
Address	51 Hurst Lane Oxford OX2 9PR
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mrs Susan Davidson
Comment ID	LPPub1079
Response Date	19/12/14 12:39
Consultation Point	2.8 Paragraph ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.1

**Q1 Do you consider the Local Plan is Legally Compliant?** No

**Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)** No

**If your comment(s) relate to a specific site within a core policy please select this from the drop down list.** N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Too many houses are proposed. At least 20,560 new houses are proposed in the Vale by 2031 in the Local Plan. This is twice government household projections, unrealistic and unsound. Since these numbers form the basis for much of the Local Plan, flaws in them undermine it critically.

Earlier this year Government figures showed that due to a change in household size over the 10 years between 2011-2021, the number of households could rise by 10%. NPPF Guidance (March 2014) suggests that Government household projections should be the starting point. Conveniently the census was taken in 2011 and by applying average household size to the population figure suggests that the Vale has approx 50,000 households. Government household projections published by the Department

for Communities and Local Government would mean that between 2011 and 2021 an additional 5,000 households would need to be planned for. This implies that the Vale's figures are excessive by at least a factor of two.

The Vale's SMHA Feb 2014 study also looks at unmet provision, delivery of social housing, and job growth. Unmet provision appears to be less than 4% of the 20,560 houses and does not need to be delivered at once. The same NPPF Guidance allows for consideration, as a last resort, of an increase in total housing figures where it could help deliver affordable housing. It would appear that might have happened here, yet the percentage of market housing required to be delivered as affordable has been reduced from 40% to 35% in the Local Plan.

Job Growth figures which form the basis of the Local Plan are projections, yet appear unprecedented in scale and appear to account for a significant proportion of total new housing requirement. This obviously is cause for serious concern as to realism, particularly as job projections are informing housing projections which are informing the Local Plan, and not only in the Vale but in the other Oxfordshire Councils. The basis of the Local Plan figures for job growth and housing requirement is circular, and unsound.

The Oxon SHMA Study suggests 106,560 houses for Oxfordshire by 2031! An average of 5,328 per year, meaning the other Oxfordshire District Councils have similar larger than would be expected housing figures as well. This number is staggering and self-evidently unsustainable.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

The Local Plan should provide a range for new housing figures between 10,280 and 20,560, the more anticipated figure being the lower and the more speculative figure being the upper of the range. This would ensure that the speculative nature of the 20,560 figure could be checked should the projections fail for any reason to be achieved, but be delivered if required.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?** No - I do not wish to participate at the oral examination